

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HELEN C. GOLDMAN and : Case No. 1:14-cv-1886-JSR  
GARY GOLDMAN, :  
: Plaintiff,  
: .  
: .  
: .  
-against- :  
: .  
: .  
: .  
NATIONSTAR MORTGAGE LLC, :  
LEHMAN BROTHERS BANK, FSB, and :  
LEHMAN BROTHERS, :  
: .  
: .  
: .  
Defendants. :  
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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the supporting Memorandum of Law dated March 2, 2015, the Declaration of Amanda L. Genovese, with exhibits annexed thereto, dated March 2, 2015, defendants Nationstar Mortgage LLC and Lehman Brothers Bank, FSB, will move this Court before the Honorable Jed S. Rakoff, United States District Court Judge, (i) pursuant to Fed. R. Civ. P. 12(b)(6), for an Order dismissing with prejudice the Complaint, or (ii), in the alternative, transferring this proceeding pursuant to 28 U.S.C. § 1404(a) to the United States District Court for the Northern District of Georgia; and (iii) for such other and further relief as may be deemed just and proper.

- Opposition papers are due March 9, 2015.
- Reply papers are due March 12, 2015.
- Oral argument will be heard on March 17, 2015 at 4PM.

Respectfully submitted,

Date: March 2, 2015  
New York, New York

**TROUTMAN SANDERS LLP**

By: Christina H. Bost Seaton  
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*Attorneys for Nationstar Mortgage LLC and  
Lehman Brothers Bank, FSB*

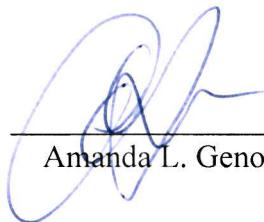
**CERTIFICATE OF SERVICE**

The undersigned, an attorney duly admitted to practice law before this Court, hereby certifies under penalty of perjury, that on March 2, 2015, she caused a true copy of the foregoing to be served upon the following parties via Federal Express overnight delivery:

David M. Schlachter  
Law Offices of David M. Schlachter, LLC  
579 Main Avenue  
Passaic, NJ 07055  
718 377-1356

*Attorneys for Plaintiffs*

Dated: New York, New York  
March 2, 2015



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Amanda L. Genovese